

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: PROTON-PUMP INHIBITOR
PRODUCTS LIABILITY LITIGATION**

**Case No. 2:17-md-2789-CCC-MF
(MDL 2789)**

This Document Relates to:

***Kersch v. AstraZeneca Pharmaceuticals LP,*
No. 2:18-cv-03159**

ORAL ARGUMENT REQUESTED

***Rieder v. AstraZeneca Pharmaceuticals LP,*
No.2:19-cv-00850**

**NOTICE OF MOTION TO EXCLUDE OPINION TESTIMONY FROM PLAINTIFFS’
SPECIFIC CAUSATION EXPERTS UNDER FEDERAL RULE OF EVIDENCE 702**

PLEASE TAKE NOTICE that on a date to be determined by the Court, the undersigned counsel for Defendants AstraZeneca Pharmaceuticals LP, AstraZeneca LP and Merck Sharp & Dohme Corporation’s (collectively, “Defendants”) will move before United States District Court of the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for an Order granting Defendants’ Motion to Exclude Opinion Testimony from Plaintiffs’ Specific Causation Experts Under Federal Rule of Evidence 702 (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants rely on the Memorandum of Law in Support of the Motion, the Certification of Gregory J. Hindy and the exhibits attached thereto, and any argument heard on the matter. Pursuant to Local Federal Civil Rule 7.1(e), a proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 78.1, Defendants request oral argument be heard on this motion.

Dated: October 15, 2021

MCCARTER & ENGLISH, LLP

/s/ Gregory J. Hindy

Gregory J. Hindy
Natalie H. Mantell
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07101-0652
(973) 622-4444
ghindy@mccarter.com
nmantell@mccarter.com

James J. Freebery
Makenzie Windfelder
405 N. King Street, 8th Floor
Wilmington, DE 19801
(302) 984-6300
jfreebery@mccarter.com
mwindfelder@mccarter.com

ICE MILLER LLP

/s/ Amy K. Fisher

Amy K. Fisher
Katherine D. Althoff
John A. Camp
One American Square, Ste. 2900
Indianapolis, IN 46281-0200
(317) 236-2100
Amy.Fisher@icemiller.com
Katherine.Althoff@icemiller.com
John.Camp@icemiller.com

*Attorneys for AstraZeneca Pharmaceuticals
LP, AstraZeneca LP and Merck Sharp &
Dohme Corporation*

**ARNOLD & PORTER
KAYE SCHOLER LLP**

/s/ Arthur E. Brown

Arthur E. Brown

Matthew J. Douglas
250 W. 55th Street
New York, NY 10019-9710
(212) 836-8000
Arthur.Brown@arnoldporter.com
Matthew.Douglas@arnoldporter.com

*Attorneys for AstraZeneca Pharmaceuticals
LP and AstraZeneca LP*